

EXHIBIT 2

From: [Alexandria Swette](#)
To: [Pak, Andrew \(LOS\)](#); [Vidya Patel](#)
Cc: [Daisy Joo](#); [Sean S. Buckley](#)
Subject: RE: [EXTERNAL] Re: Privileged & Confidential | Subpoena Discussion with Kobre & Kim LLP
Date: Monday, February 17, 2025 10:15:45 PM

Andrew,

Thank you for meeting with us today. Per our call, below is a list of topics, which span a few different Google products. As discussed, we believe some of these topics may be covered by Mr. Gaddis, who we understand the Government intends to call at trial. According to the Government's disclosures, Mr. Gaddis may not have relevant knowledge with respect to certain other topics—namely, Google Analytics and Google Search Console—and so testimony by a different Google representative (or a stipulation) may be required. We would appreciate the chance to speak with Mr. Gaddis on these topics, and we are happy to work around his schedule.

On our call, you mentioned that Google may have produced documents in response to Mr. Amar's Rule 17(c) subpoena in July of 2024. Please confirm the basis for your understanding and which (if any) productions you were referring to.

Please let us know if you are available to confer again later this week.

Best,
Alexandria

1. Features and capabilities of Google services for businesses, such as Google Workspace, including file storage, sharing or collaboration in Google Drive, Google Docs, Google Sheets, and Google Slides.
2. Collection and meaning of metadata in Google Drive, Google Docs, Google Sheets, and Google Slides, and terms such as "Gaia_ID," "Indexable content change," "Document owner," "Edit," "View," "Import," and "Writer."
3. Integrations of Google services for businesses, such as Google Drive, Google Docs, Google Sheets, and Google Slides, with communication platforms such as Slack and Gmail.
4. Google Analytics' features and capabilities for analyzing website performance, user engagement, retention and acquisition, and marketing, including integration with data repositories or other platforms or services, such as Google Ads, Search Ads 360, Google Ad Manager, and Google Campaign manager.
5. Google Analytics' collection of data and metrics for analyzing website performance, user engagement, retention and acquisition, and marketing, including "users," "new users," "sessions," "traffic," "goals," "conversion," and "funnel," and for Google Analytics reports, such as "audience reports," "conversion reports," "acquisition reports," and "goal reports."

6. Google Analytics' features and capabilities for viewing, evaluating, and exporting data collected for analyzing website performance, user engagement, retention and acquisition, and marketing.
7. Google Analytics' features and capabilities for identifying, analyzing, or categorizing website visitors, including through "User-ID" or demographic information.
8. The decommissioning of the legacy Google Analytics platform, which occurred in July 2024, including the current availability of historical data.
9. Google Search Console's features and capabilities for analyzing website performance.
10. Google Search Console's collection of data and metrics for purposes of analyzing website performance, including "impressions" and "clicks," and for Google Search Console reports.
11. Google Search Console's features and capabilities for viewing, evaluating, and exporting data collected for analyzing website performance.

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From: Pak, Andrew (Perkins Coie) <APak@perkinscoie.com>

Sent: Monday, February 17, 2025 9:56 AM

To: Alexandria Swette <Alexandria.Swette@kobrekim.com>; Vidya Patel <Vidya.Patel@kobrekim.com>
Cc: Daisy Joo <Daisy.Joo@kobrekim.com>; Sean S. Buckley <Sean.Buckley@kobrekim.com>
Subject: RE: [EXTERNAL] Re: Privileged & Confidential | Subpoena Discussion with Kobre & Kim LLP

Terrific, thanks.

Andrew S. Pak, JD/CISSP | Perkins Coie LLP
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E. APak@perkinscoie.com

*Admitted in California, New York, and New Jersey

From: Alexandria Swette <Alexandria.Swette@kobrekim.com>
Sent: Monday, February 17, 2025 6:53 AM
To: Pak, Andrew (LOS) <APak@perkinscoie.com>; Vidya Patel <Vidya.Patel@kobrekim.com>
Cc: Daisy Joo <Daisy.Joo@kobrekim.com>; Sean S. Buckley <Sean.Buckley@kobrekim.com>
Subject: RE: [EXTERNAL] Re: Privileged & Confidential | Subpoena Discussion with Kobre & Kim LLP

4 pm PT works. Talk then.

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From: Pak, Andrew (Perkins Coie) <APak@perkinscoie.com>
Sent: Monday, February 17, 2025 9:48 AM

To: Vidya Patel <Vidya.Patel@kobrekim.com>

Cc: Daisy Joo <Daisy.Joo@kobrekim.com>; Alexandria Swette <Alexandria.Swette@kobrekim.com>; Sean S. Buckley <Sean.Buckley@kobrekim.com>

Subject: RE: [EXTERNAL] Re: Privileged & Confidential | Subpoena Discussion with Kobre & Kim LLP

Counsel,

With apologies, I have to cancel our call today. Part of the reason is that my work cellular device malfunctioned last night, and I have to go get it sorted out and will not have email or phone access while I am getting it fixed. If we shoot for tomorrow morning same time, I won't have an issue because I can definitely join by VOIP, but I do need to take time this afternoon offsite to get my phone fixed and won't be able to join a call today. If we wanted to shoot for about 4pm PT or later today, I can join that as I will be back by then. If that is the case, please feel free to set the call for 4pm PT or later today. I probably won't accept that invite until closer to then, but should have no issues joining if you send me an updated invite, I just likely won't be able to confirm until mid-to-late afternoon my time.

Thank you,
Andrew Pak

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*Admitted in California, New York, and New Jersey

From: Vidya Patel <Vidya.Patel@kobrekim.com>

Sent: Saturday, February 15, 2025 6:48 PM

To: Pak, Andrew (LOS) <APak@perkinscoie.com>

Cc: Daisy Joo <Daisy.Joo@kobrekim.com>; Alexandria Swette <Alexandria.Swette@kobrekim.com>; Sean S. Buckley <Sean.Buckley@kobrekim.com>

Subject: RE: [EXTERNAL] Re: Privileged & Confidential | Subpoena Discussion with Kobre & Kim LLP

Yes of course,

I have adjusted accordingly, thank you.

Vidya Patel
Analyst
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From: Pak, Andrew (Perkins Coie) <APak@perkinscoie.com>

Sent: Saturday, February 15, 2025 9:44 PM

To: Vidya Patel <Vidya.Patel@kobrekim.com>

Cc: Daisy Joo <Daisy.Joo@kobrekim.com>; Alexandria Swette <Alexandria.Swette@kobrekim.com>; Sean S. Buckley <Sean.Buckley@kobrekim.com>

Subject: [EXTERNAL] Re: Privileged & Confidential | Subpoena Discussion with Kobre & Kim LLP

Can you set this for 3pm your time? We were shooting for 12 pm PT.
Sent from my iPhone

> On Feb 15, 2025, at 6:41 PM, Vidya Patel <Vidya.Patel@kobrekim.com> wrote:

>

> Hi All,

>

> Please find below the meeting invite for Monday, February 17th at 12pm.

>

>

> Join Zoom Meeting

> [https://urldefense.com/v3/__https://kobrekim.zoom.us/j/98483219864?pwd=IAaBub2QxyjnfvgSL4HFITckWax30.1__!!NACRu3oIWw!soF3H1Jb35IDtw9OefoID5bKhgzT8gJv9TAmBhuig3U\\$snQQ_rP6aXLGUSPVOzRHrfgQ27xYAapNrxAqEgCg\\$<https://urldefense.com/v3/__https://kobrekim.zoom.us/j/98483219864?pwd=IAaBub2QxyjnfvgSL4HFITckWax30.1__!!K_R5ZAeljLw!Czznre95TErDnryia8G00QLyVdc3A-NZ_owZV0jLyQH8LzO18ZR_28nOnh-bLqUZJ31TUcuHmRST1Qd4at7AjhQ\\$>](https://urldefense.com/v3/__https://kobrekim.zoom.us/j/98483219864?pwd=IAaBub2QxyjnfvgSL4HFITckWax30.1__!!NACRu3oIWw!soF3H1Jb35IDtw9OefoID5bKhgzT8gJv9TAmBhuig3U$snQQ_rP6aXLGUSPVOzRHrfgQ27xYAapNrxAqEgCg$<https://urldefense.com/v3/__https://kobrekim.zoom.us/j/98483219864?pwd=IAaBub2QxyjnfvgSL4HFITckWax30.1__!!K_R5ZAeljLw!Czznre95TErDnryia8G00QLyVdc3A-NZ_owZV0jLyQH8LzO18ZR_28nOnh-bLqUZJ31TUcuHmRST1Qd4at7AjhQ$>)

>

> Meeting ID: 984 8321 9864

> Passcode: 345916

>

>
> Kindly,
> Vidya
>

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